

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Application Review

Issue Date: **INSERT DATE**

Region: Mooresville Regional Office
County: Cabarrus
NC Facility ID: 1300027
Inspector's Name: Bob Caudle
Date of Last Inspection: 08/28/2017
Compliance Code: 3 / Compliance - inspection

Facility Data Applicant (Facility's Name): Berenfield Containers (S.E.), Ltd. Facility Address: Berenfield Containers (S.E.), Ltd. 12180 University City Boulevard Harrisburg, NC 28075 SIC: 3412 / Metal Barrels, Drums & Pails NAICS: 332439 / Other Metal Container Manufacturing Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V				Permit Applicability (this application only) SIP: 15A NCAC 02D .0515, .0516, .0521, .0951, .0958, .1100 .1806, 02Q .0317, .0711 NSPS: NESHAP: Subpart M PSD: PSD Avoidance: NC Toxics: 112(r): Other: Remove 15A NCAC .1111 (Subpart DDDDD, only, not MMMM), 02Q 0705 (repealed),			
Contact Data				Application Data			
Facility Contact David Henderson Material Manager (704) 455-2111 12180 University City Blvd Harrisburg, NC 28075	Authorized Contact Ken Fowler Vice President (704) 455-2111 12180 University City Blvd Harrisburg, NC 28075	Technical Contact David Henderson Material Manager (704) 455-2111 12180 University City Blvd Harrisburg, NC 28075	Application Number: 1300027.15A Date Received: 12/04/2015 Application Type: Renewal/Modification Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 05577/T16 Existing Permit Issue Date: 07/24/2012 Existing Permit Expiration Date: 10/31/2016				
Total Actual emissions in TONS/YEAR:							
CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2015	0.0100	0.9600	90.27	0.8100	0.1600	3.57	1.55 [Phenol]
2014	0.0100	0.9900	103.17	0.8400	0.1800	4.02	1.76 [Phenol]
2013	0.0100	1.12	97.75	0.9400	0.1900	4.39	1.97 [Phenol]
2012	0.0100	1.10	97.17	0.9200	0.1600	4.88	2.56 [Phenol]
2011	0.0100	1.16	96.70	0.9700	0.2100	3.30	1.92 [Phenol]
Review Engineer: Charles F. Yirka Review Engineer's Signature:				Comments / Recommendations: Issue 05577/T17 Permit Issue Date: INSERT DATE Permit Expiration Date: INSERT DATE			

I. Purpose of Application

This permitting action is a renewal of an existing Title V permit pursuant to 02Q .0513. The existing Title V permit (**05577T15**) was issued on **July 24, 2012**, and was currently scheduled to expire on **November 31, 2016**. The renewal application was received on **December 4, 2015**, or at least nine months prior to the expiration date. Therefore, the existing permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied.

As part of this permit renewal, Berenfield requested the following modifications to the permit (*DAQ response in italics*):

Emissions Sources

Berenfield requests that the following sources be removed from the Title V permit as they are no longer operational:

ID No. PW-1 – One two stage parts washer with indirect natural gas-fired burner and direct natural gas-fired dryer was decommissioned in **January 2014** and physically removed from the facility in **April 2014**. *Concur; source has been removed and the applicable conditions were removed from the permit.*

In addition, Berenfield requested the following changes to the Title V permit:

- **ID No. SEAM** – One compounding operation for the application of seam sealer material – this material usage was previously captured in the emissions for paint operations (**ID No. ES-05**). With this renewal, Berenfield requested to track emissions from this operation as a separate emissions source. As such this source is considered an existing source e.g., MACT MMMM. *Concur; source and the applicable regulations have been added to the permit;*
- **ID No. ES-05** – Drum Paint Booth – the solvent used for cleaning the paint booth was replaced with a Glycol Ether EB material in January 2012. The Glycol Ether EB material does not contain any HAP or TAP components, and will only result in VOC emissions. Note that while the material is named “Glycol Ether EB,” there are no defined glycol ethers emitted from the material. Appendix D Page 6-18 of the application indicates the MSDS was considered in making this claim. Potential emissions of VOC from the facility will remain limited to 250 tons per year (tpy). *Concur; this change in booth cleaning material as this does not affect the current applicable regulations; and*

In addition, as of June 2014, Berenfield uses MEK in the paint gun cleaning operations in the same paint booth (**ID No. ES-05**). Appendix D Page 1 of 18 indicates MEK usage is 0.74 pounds per hour emissions the TPER limitation is 7.6 pounds per hour and 52 pounds per day. A permit modification is not required for this change, as potential emissions of MEK will remain below permitting limits in 15A NCAC 02Q .0711. *Concur; this change in booth cleaning material does not affect the current applicable regulations.*

Updates to emissions calculations:

- Changes in facility-wide usage percentages of materials based on updates in client specifications and product portfolio.

- Increase in lining and surface coating required per part, due to an update from the previously submitted calculations.
- Updates in emission values due to material updates as listed on the latest MSDSs for the materials used at the facility.

Addition and Removal of Insignificant Activities:

Berenfield also requested the following changes to the insignificant activities in the Title V permit:

Heaters Removed:

ID No. ISH2 – Parts Stock Area space heater (removed **February 2014**)

ID No. ISH3 - Compounder space heater (removed **February 2014**)

Heaters Replaced:

ID No. ISH1 – Maintenance Department space heater – 0.03 million Btu/hr natural gas-fired heater replaced with a 0.10 million Btu/hr natural gas-fired heater (replaced **January 2012**)

ID No. ISH6 – Press Department 2 space heater – 0.03 million Btu/hr natural gas-fired heater replaced with a 0.10 million Btu/hr natural gas-fired heater (replaced **January 2013**)

Heater Added:

ID No. ISH13 – Seamer area space heater – 0.25 million Btu/hr natural gas-fired heater (installed **January 2012**)

Per 15A NCAC 02Q.0503(8), insignificant activities are defined as operations which have emissions less than 5 tpy for criteria pollutants and less than 1,000 pounds per year (lb/yr) for all hazardous air pollutants (HAPs). Berenfield requested an update to the insignificant activities list to correspond to the changes listed above. Detailed emission calculations for the heaters were included in Appendix D of the application. *Concur with calculations and all changes to the insignificant activities list.*

Requested Removal of State Toxic Air Pollutant Requirements

Permit conditions 2.2.A.4 and 2.2.A.6 reference toxic air pollutant (TAP) regulations at 15A NCAC 02D .1100 and 15A NCAC 02Q .0711, respectively. These regulations are state-only enforceable and are not part of North Carolina's SIP. Per guidance issued by DENR in 2009, dispersion modeling is required in North Carolina if emission rates for toxic air pollutants rise above levels listed in 15A NCAC 02Q .0711 due to the addition of a new source or modification of an existing source.

However, on May 1, 2014, 15A NCAC 02Q .0700, Toxic Air Pollutant Procedures, was amended in part to exempt from state air toxics emissions controls those sources of emissions that are subject to certain federal emissions requirements. Pursuant to 15A NCAC 02Q .0702(a)(27), a permit to emit TAPs shall not be required under this Section for:

(27) *an air emission source that is any of the following:*

(A) *subject to an applicable requirement under 40 CFR Part 61, as amended;*

(B) *an affected source under 40 CFR Part 63, as amended; or*

(C) *subject to a case-by-case MACT permit requirement issued by the Division pursuant to Paragraph (j) of 42 U.S.C. Section 7412, as amended;*

All currently permitted equipment, as well as the added source (**ID No. SEAM**), are subject to standards under 40 CFR Part 63, Subpart M as described in Section 5.1.4.1 of the application. Therefore, toxics modeling to determine emission limits in the permit are not required for these

sources. However, as required under Session Law 2012-91 House Bill 952, it is still the responsibility of DAQ to determine whether a project has the potential to result in an unacceptable risk to human health. Only facility-wide TAP emissions that are higher than the TAP permitting emission rate (TPER Unacceptable risk occurs the maximum impact from a source exceeds the acceptable ambient level (AAL) listed in 15A NCAC 02D .1104.), as listed in 15A NCAC 02Q .0711, are considered in determining unacceptable risk.

In reviewing this application, it was determined that there was not sufficient information considering reformulated coating etc. to make a determination that there would be no unacceptable risk to human health. This engineer contacted the applicant and consultant to obtain the required information. The consultant indicated that Berenfield did not wish to pursue the removal of the air toxics requirements now, therefore, these conditions remain unchanged. *Continued compliance with these specific conditions is indicated.*

Sample Emissions Calculations

This section of the Title V permit renewal application presented the methodology used to quantify the potential to emit (PTE) from the facility drum manufacturing operations. Complete documentation of emission factors and computation of potential emissions of criteria pollutants and HAP/TAP was provided in Appendix D of this application. *Concur with calculations.*

II. Facility Description

The facility is a steel drum manufacturer. 55-gallon drums are manufactured and painted (approximately 98,000 drums per month are manufactured). Current permitted equipment includes cleaning, painting, and stenciling/printing stations.

III. History/Background/Application Chronology

November 28, 2011 – Permit 05577T15 was issued as a Title V renewal. See application 1300027.11A.

July 24, 2012 – Permit 05577T16 was issued. The permit was Reopened for Cause. See application 1300027.12A. NCDAQ determined that the Permittee operated an existing indirect-fired combustion source (**ID No. PW-1**) that was subject to 112j Case-by-Case Maximum Achievable Control Technology (MACT) standards applicable to this unit.

November 12, 2015 – Facility was last inspected by Ms. Dawson of the MRO.

December 4, 2015 – Permit application 1300027.15A was received for the renewal of the Title V permit. The application was incomplete. As this was a permit renewal with modification a permit modification fee was required.

December 14, 2015 – Additional fee of \$918 was received and the application was complete.

December 20, 2015 – The regional permit application review comments were completed.

July 18, 2016 – An odor complaint was received by Mr. Bruce Ingle of the Mooresville Regional Office (MRO).

July 20, 2016 – Follow up investigation was conducted by Ms. Tonisha Dawson of the MRO. No odors or visible emissions were detected. In summary, the investigation was closed.

December 15, 2016 – Permit renewal application was reassigned to this engineer.

July 28, 2017 – DRAFT permit sent to Title V Permit Supervisor Mr. Mark Cuilla for comment

July 28, 2017 – Comments received from Mr. Cuilla.

August 8, 2017 – Request for additional information was made to Ms. Melissa Bamford of Trinity Consultants in response to Berenfield's request to remove the state air toxics conditions as allowed by Session Law 2012-91 House Bill 952.

August 11, 2017 – Received email from Ms. Bamford indicating Mr. Henderson wished to proceed with the renewal permit without removing the state air toxics conditions.

August 28, 2017 – Facility was inspected by Mr. Bob Caudle of the MRO.

September 1, 2017 – A notice of deficiency letter was issued by MRO to Mauser USA, LLC for failing to apply for a request for a name change and change-of ownership. Discussed proceeding with renewal with Mr. Cuilla. We agreed to proceed. I sent email to Mr. Caudle and called Mr. David Henderson of Berenfield to let them know we were going ahead with renewal.

INSERT DATE – DRAFT permit sent to 30-day public notice and 45-day EPA review. The 30-day public comment period ended **INSERT DATE** with the receipt of **XX** comments. The 45-day EPA review period ended **INSERT DATE** with the receipt of **XX** comments.

IV. Permit Modifications/Changes and ESM Discussion

The following table describes the modifications to the current permit as part of the renewal process.

Page	Section	Description of Change
Cover Letter	-	-amended dates, permit numbers, signatures, etc. as required -added increment statement
Attachment	Insignificant Activities	-added and changed descriptions of space heaters (ID Nos. ISH1, ISH4, ISH5, ISH6, ISH8, ISH9 and ISH10 through ISH13) per the renewal application -added Note 3
Cover	-	-amended permit revision numbers and all dates
All	Header	-amended permit revision number
3	Equipment Table	-added steel drum sealing operation (ID No. SEAM) per renewal application -removed source (ID No. PW-1) per renewal application -removed note concerning shield for this source
4-5	2.1 A 2.1 A (table)	- added steel drum sealing operation (ID No. SEAM) per renewal application -clarified applicability of 02D .0515, 02Q .0317 and 02D .0958. -removed reference to 02Q .0705 as this rule has been repealed
7	2.1 B (table)	- removed reference to 02Q .0705 as this rule has been repealed

Page	Section	Description of Change
8-11	2.1 C (table) 2.1 C.1-4	--removed source (ID No. PW-1) per renewal application -removed all applicable conditions associated with source (ID No. PW-1)
12	2.2 A (table)	-removed reference to 02Q .0705 as this rule has been repealed
16-28	2.2 A.7.a-x	-modified .02D .1111 MACT condition to include steel drum sealing operation (ID No. SEAM) and remove source (ID No. PW-1) per renewal application
28	2.2 A.8	-removed 02Q .0705 condition as this rule has been repealed
30-38	General Conditions	-updated shell general conditions (version 5.0 06/08/17)

Changes to the Title V Equipment Editor (TVEE) were approved by Ms. Jenny Sheppard on **INSERT DATE**.

V. Regulatory Review

The facility is currently subject to the following regulations:

15A NCAC 02D .0515, Particulates from Miscellaneous Industrial Processes
15A NCAC 02D .0516, Sulfur Dioxide Emissions from Combustion Sources
15A NCAC 02D .0521, Control of Visible Emissions
15A NCAC 02D .0951, Miscellaneous Volatile Organic Compound Emissions
15A NCAC 02D .0958, Work Practice Standards for Sources of Volatile Organic Compounds
15A NCAC 02D .1100, Control of Toxic Air Pollutants
15A NCAC 02D .1111, Maximum Achievable Control Technology - 40 CFR 63, Subpart DDDDD and 40 CFR 63, Subpart MMMM
15A NCAC 02D .1806, Control and Prohibition of Odorous Emissions
15A NCAC 02Q .0317, Avoidance Conditions (for 15A NCAC 02D .0530, Prevention of Significant Deterioration)
15A NCAC 02Q .0705, Existing Facilities and SIC Calls
15A NCAC 02Q .0711, Emission Rates Requiring a Permit

The following regulations will no longer apply:

15A NCAC 02D .1111, Maximum Achievable Control Technology - 40 CFR 63, Subpart DDDDD
15A NCAC 02Q .0705, Existing Facilities and SIC Calls

A regulatory review for those existing requirements that required an applicability review follow:

15A NCAC 02D .0515, Particulates from Miscellaneous Industrial Processes - Emissions from the existing parts lining/painting work station booth (**ID No. ES-01**), the shell lining booth (**ID No. ES-02**), and the drum paint booth (**ID No. ES-05**) all emit particulate matter (PM). The applicant requested the source (**ID No. SEAM**), one compounding operation for the application of seam sealer material, be broken out as a separate source from the paint operations (**ID No. ES-05**). The material usage was previously captured in the emissions for the paint operations (**ID No. ES-05**). Even so, there will not be any particulate emissions associated with this source, therefore, this rule does not apply to source (**ID No. SEAM**). Continued compliance is expected for the remaining affected sources (**ID Nos. ES-01, ES-02 and ES-05**).

15A NCAC 02D .0521, Control of Visible Emissions - See above discussion for 02D .0515. As there will not be any particulate emissions and, therefore, visible emissions associated with the source (**ID No. SEAM**) this rule does not apply. Continued compliance is expected for the remaining affected sources (**ID Nos. ES-01, ES-02 and ES-05**).

15A NCAC 02D .0951, Miscellaneous Volatile Organic Compound Emissions - The applicant requested the source (**ID No. SEAM**), one compounding operation for the application of seam sealer material, be broken out as a separate source from the paint operations (**ID No. ES-05**). As such the source remains affected by this regulation. Even so the applicable MACT Subpart Mmmm previously satisfied the RACT requirement pursuant to 02D .0951. Therefore, the source remains an affected source pursuant to 02D .0951.

15A NCAC 02D .1111, Maximum Achievable Control Technology - (40 CFR 63, Subpart DDDDD) – This regulation no longer applies since the source (**ID No. PW-1**) has been removed. See above discussion under Section 1 – Emissions Sources.

15A NCAC 02D .1111, Maximum Achievable Control Technology - (40 CFR 63, Subpart Mmmm) Subpart Mmmm regulates HAPs for miscellaneous metal parts and products surface coating facilities. Steel drums are included as metal parts and products under the applicability of 40 CFR 63.3881(a). All permitted sources (**ID Nos. ES-01, ES-02, ES-05, SILK, and SEAM**) are part of the affected source under Subpart Mmmm. With this renewal, Berenfield requested the source (**ID No. SEAM**), one compounding operation for the application of seam sealer material, be broken out as a separate source from the paint operations (**ID No. ES-05**) and to track emissions from this operation as a separate emissions source. As such this source is considered an existing source under the MACT. Continued compliance is expected.

15A NCAC 02Q .0705, Existing Facilities and SIC Calls - This regulation was repealed and no longer applies.

VI. NSPS, NESHAPS/MACT, PSD, 112(r), CAM

NSPS – The facility is not currently subject to any New Source Performance Standards. This permit renewal does not affect this status.

NESHAPS/MACT – The following sources (**ID Nos. ES-01, ES-02, ES-05, SILK, and PW-1**) are currently listed as being subject to the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. With this renewal, Berenfield requested the source (**ID No. SEAM**) one compounding operation for the application of seam sealer material be broken out as a separate source from the paint operations (**ID No. ES-05**) as such it is considered an existing source under the MACT. Compliance with this standard was required on **January 2, 2007** for all existing sources. Initial notification of applicability was received by the Division on **May 6, 2002**. The current permit includes the specific permit language applicable to these sources. This permit renewal does not affect this status.

Berenfield requested that the source (**ID No. PW-1**) be removed from the Title V permit as it is no longer operational. As such the associated MACT condition for National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters was removed from the permit.

PSD – The facility is currently subject to a permit condition that limits volatile organic compound emissions facility-wide to less than 250 tons per year. The Permittee is required to complete monthly

VOC emissions calculations by multiplying total amount of each type of VOC-containing material consumed during the month by the VOC content of the material. Calculations are to be recorded monthly in a logbook. The current permit also requires semi-annual reporting of the monitoring and recordkeeping activities. This permit renewal does not affect this status.

112(r) – The facility is not currently subject to the 112(r) “Prevention of Accidental Releases” requirements because it does not store any chemicals in amounts greater than the applicability threshold. This permit renewal with modification does not affect this status.

CAM – 40 CFR 64 requires that a continuous compliance assurance monitoring plan be developed for all equipment located at a major facility, that have pre-controlled emissions above the major source threshold, and use a control device to meet an applicable standard. No permitted equipment currently employs a control device; therefore, CAM does not apply. This permit renewal does not affect this status.

VII. Facility Wide Air Toxics

See the above discussion under Section I – Requested Removal of State Toxic Air Pollutant Requirements.

VIII. Facility Emissions Review

See the table on Page 1.

IX. Stipulation Review

The facility was inspected by Ms. Tonisha Dawson of the MRO on **November 12, 2015**. Based on her findings, the facility appeared to be in compliance with all of the applicable air quality regulations. The facility was last inspected on August 28, 2017 as a result a notice of deficiency letter was issued to Mauser USA, LLC for failing to submit an application for a name/ownership change.

X. Public Notice/EPA and Affected State(s) Review

A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 02Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 02Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant shall be provided to EPA. Also, pursuant to 02Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice provided to the public under 02Q .0521 above. South Carolina is an affected state and Mecklenburg County is an affected local program within 50 miles of this facility.

XI. Conclusions, Comments, and Recommendations

A professional engineer’s seal was not required for this renewal.

A consistency determination was not required for this renewal.

MRO recommends issuance of the permit and was presented with a DRAFT permit prior to notice and issuance.

This draft permit and review does not address the recent NOD letter. Before this permit is issued an application for a name/ownership change should be received. It is recommended the necessary changes to the permit and review will be made prior to issuance of this permit.

RCO concurs with MRO's recommendation to issue the renewed air permit.

DRAFT